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June 16, 2021

**VIA ECF**

Hon. Paul A. Crotty, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

6/17/2021

The report (✓) is granted and  
the matter stayed until 7/9/2021

Re: *Alejandro Huggins v. Jonathan Wiener, et al.*  
SDNY Case No. 1:18-cv-01037 (PAC)

Approved

Dear Judge Crotty:

*Paul Weisbrot*  
WSB

This firm represents the defendants in the above-referenced action. Pursuant to Your Honor's Individual Practices, Rules 1.A and 1.E, we write to respectfully request that the proceedings in the above-captioned action and any pending deadlines therein be stayed through Friday, July 9, 2021.

Ari Weisbrot, of the Law Office of N. Ari Weisbrot LLC, has passed away. Prior to his passing, Mr. Weisbrot had served, along with our office, as co-lead counsel for defendants in this matter. Defendants seek the requested stay to assess their representation and make appropriate arrangements for continuing their defense. We have conferred with counsel for plaintiffs, who do not object to this application.

Pursuant to the Case Management Plan and Scheduling Order entered by this Court on February 23, 2021, the parties had been due to complete fact discovery no later than Monday, June 28, 2021. While both named plaintiffs have been deposed, several depositions remain outstanding. Should the stay be granted, Defendants propose that the parties submit a revised case management plan proposing a schedule to complete the remaining depositions, to be submitted by the conclusion of the proposed stay, no later than Friday, July 9, 2021.

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We thank the Court for its consideration of this request.

Respectfully Submitted,

CLIFTON BUDD & DEMARIA, LLP  
*Attorneys for Defendants*

By:

  
Stephen P. Pischl

cc: **VIA ECF**  
BERANBAUM MENKEN LLP  
*Attorneys for Plaintiff*  
  
BORRELLI & ASSOCIATES, P.L.L.C.  
*Attorneys for Plaintiffs*